TITLE V ENFORCEMENT

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TITLE V ENFORCEMENT

- Full Compliance Evaluations
- Compliance Certifications
- Enforcement Strategy

FULL COMPLIANCE EVALUATIONS

- New Term
- Inspection and File Review
- Review of all required records, reports, stack tests, semi-annual reports, annual certifications, enforcement files and permitting files.
- On-site visit

COMPLIANCE CERTIFICATIONS

- 40 CFR Part 70.6(c) (5)
- Not less than annually
- Means for monitoring compliance
- Any and all information needed to assure compliance

REQUIRED INFORMATION

- Identification of each permit term and condition
- Identification of method of compliance determination
- Identification of compliance status
- Identification of each deviation, exception, excursion or exceedence

ENFORCEMENT STRATEGY

- Three Phases
- Phase I - Tracking
- Phase II - Administrative Review
- Phase III - Substantive Review

TRACKING

- Regional Database
- Information from State and Local Permitting Agencies
- Certification Due Date
- Certification Received
- Deviations Reported

PHASE I ENFORCEMENT

- Administrative Orders
- No penalty
- Since 2000 - 185 Administrative Orders
- 3 Orders to Military Installations

ADMINISTRATIVE REVIEW

- Accuracy
- Completeness
- Referenced Attachments
- Signed

PHASE II ENFORCEMENT

- Form Letter
- No Penalty

SUBSTANTIVE REVIEW

- Verify accuracy of certification
- Review information submitted with the certification
- Utilize the High Priority Violator List
- Contact State/Local agency for additional information and discussion.

PHASE III ENFORCEMENT

- Administrative Penalty Orders
- Started in 2003
- 6 Penalty Orders Sent

TITLE V ENFORCEMENT CONTACT

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